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9

10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 DARNELL WILLIAMS, individually
and on behalf of all others similarly
14 situated,

15 Plaintiff,

16 vs.

17 TESLA, INC.,

18 Defendant.
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No.: 3:23-cv-04832-JD

Assigned to: James Donato

**STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
COMPLAINT; [PROPOSED]
ORDER**

1 Pursuant to Local Rule 6-1(a), Plaintiff Darnell Williams (“Plaintiff”) and
2 Defendant Tesla, Inc. (“Defendant”), by and through their undersigned counsel,
3 hereby stipulate as follows:

4 WHEREAS, on September 20, 2023, Plaintiff filed its Complaint (ECF No.
5 1),

6 WHEREAS, on November 7, 2023, Plaintiff served the Complaint on
7 Defendant;

8 WHEREAS, Defendant’s current deadline to respond to the Complaint under
9 Federal Rule of Civil Procedure 12(a)(1)(A)(i) is November 28, 2023;

10 WHEREAS, the parties have met and conferred and agreed to extend
11 Defendant’s deadline to respond to the Complaint by approximately 60 days to
12 January 27, 2024;

13 WHEREAS, the parties have met and conferred and agreed that Plaintiff’s
14 response to Defendant’s responsive pleading, if response is required, shall not be
15 due until February 26, 2024, regardless of when Defendant files its responsive
16 pleading;

17 WHEREAS, good cause exists for this extension, as it is in the interest of
18 judicial efficiency and overall economy to allow the parties to attempt to narrow the
19 pleadings issues before proceeding with the litigation;

20 WHEREAS, this extension will not alter the date of any event or any
21 deadline already fixed by Court order.

22 NOW, THEREFORE, the parties stipulate that Defendant’s deadline to
23 answer, move or otherwise respond to the Complaint will be extended to January
24 27, 2024.

25 IT IS SO STIPULATED.
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1 Dated: November 29, 2023

COHELAN KHOURY & SINGER

2 By /s/ Timothy D. Cohelan
3 Timothy D. Cohelan
4 Attorneys for Plaintiff, Darnell Williams
5 and the alleged class

6 Dated: November 29, 2023

MORGAN, LEWIS & BOCKIUS LLP

7 By /s/ Joseph Duffy
8 Joseph Duffy
9 Attorneys for Defendant, Tesla, Inc.

FILER'S ATTESTATION

10 Pursuant to Local Rule 5-1(h)(3) regarding signatures, I attest that all other signatories
11 listed, and on whose behalf this filing is submitted, concur in the document's content, and have
12 authorized the filing.
13

14 Dated: November 29, 2023

MORGAN, LEWIS & BOCKIUS LLP

15 By /s/ Joseph Duffy
16 Joseph Duffy
17 Attorneys for Defendant, Tesla, Inc.

[PROPOSED] ORDER

Having considered the Parties' Stipulation to Extend Deadline to Respond to Complaint, and good cause appearing, it is hereby ORDERED that:

Defendants time to answer, move or otherwise respond to Plaintiff's Complaint shall be extended through and including December 28, 2023.

IT IS SO ORDERED.

Dated: _____

Hon. James Donato
United States District Judge